

UNITED STATES DISTRICT COURT OF MASSACHUSETTS  
FILE# 04-CV-11959-NG.

FILED  
IN CLERK'S OFFICE

ATTENTION: COOLEY MANION JONES

2006 MAY 22 A 8:37

FLAVIA BENITEZ  
PLAINTIFF

PRO- SE U.S. DISTRICT COURT  
DISTRICT OF MASS.

VS

SODEXHO- MARRIOTT  
DEFENDANTS

COOLEY MANION JONES

MOTION FOR PROTECTIVE ORDER

IN RESPOND TO COOLEY MANION JONES LETTER ON MAY 8, 2006  
REMINDING A DEPOSITION SCHEDULE BY YOU (WITHOUT MY  
APPROVAL) FOR MAY 23, 2006 @ 10:00 AT COOLEY MANION JONES  
OFFICE 21 CUSTOM HOUSE ST. BOSTON .

1- FLAVIA BENITEZ APPEALED IN COURT AT THE CONFERENCE  
ON MARCH 27, 2006 AND IN WRITING A PPEAL SUBMITTED AT THE  
OFFICE 'S CLERK. ON THE SAME DAY MARCH 27, 2006.

2- FLAVIA BENITEZ 'S U. S. CONSTITUTIONAL RIGHTS WILL BE  
COMPROMISED WITHOUT THE PRESENCE OF AN ATTORNEY .

3- FAILURE TO SEND ME THE ISSUES QUESTIONS RELATE TO THE  
DEPOSITION.

4- MASS CIVIL RULE 45 (F) AND LIABILITY FOR TORT DAMAGES  
M G L A C 233 4

5- MASS CIVIL RULE 30 d (1) THE PHYSICAL CONDITION IS AN  
ISSUE, SCHEDULE AND DURATION OF DEPOSITION.

6- FLAVIA BENITEZ OR HER COUNSEL AND THE DEFENDANTS'S  
COUNSELS WORK TOGETHER AND AGREE WHEN , WHERE ,  
HOW LONG AND ISSUES OF THE DEPOSITION FOR ALL PARTIES.

MAY 18, 2006  
MAY 22, 2006.

RESPECTFULLY SUBMITTED

*Flavia Benitez*  
FLAVIA BENITEZ

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